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Attorneys for Plaintiffs  
RUBEN JUAREZ and ISELA HERNANDEZ

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

RUBEN JUAREZ an individual and ISELA	)	CASE NO. 2:17-cv-003342
HERNANDEZ, an individual,	)	
	)	
Plaintiffs,	)	<b>JOINT REPORT FOR JULY 10,</b>
	)	<b>2017 SCHEDULING</b>
v.	)	<b>CONFERENCE</b>
	)	
PRECISION VALVE & AUTOMATION,	)	Scheduling Conference Set
INC., a corporation and DOES 1-20,	)	For July 10, 2017 at 1:30 p.m.
	)	
Defendants.	)	
	)	

Pursuant to the Court's May 8, 2017 order, Local Rule 6 and Federal Rules of Civil Procedure 16 and 26, the parties hereby submit the following Joint Report after meeting and conferring on these issues as required by this Court:

(1) The parties propose the following discovery plan:

- a. written discovery including third party subpoenas may begin on July 11, 2017,
- b. initial disclosures pursuant to Federal Rule 26(a)(1) shall be made on or before August 16, 2017,
- c. the parties will attempt to accomplish most or all written discovery by December 29, 2017,
- d. fact depositions will begin in January, 2018 and continue through March, 2018,
- e. fact discovery cutoff will be April 16, 2018,
- f. expert reports must be exchanged by May 15, 2018,
- g. rebuttal expert reports must be exchanged by June 5, 2018,
- h. expert discovery cutoff deadline is August 6, 2018.
- i. Law and Motion: The parties do not at this time foresee filing law and motion matters except PVA may file a motion for summary judgment. The parties propose that the last date to hear motions, including dispositive motions, be September 17, 2018.

(2) Current status of settlement discussions: Plaintiffs have made a settlement demand in this case. Defendant Precision Valve & Automation, Inc. ("PVA") needs to conduct written discovery regarding topics including the statute of limitations, medical causation and plaintiffs' workers' compensation action before responding to plaintiffs' settlement demand. Pursuant to Local Rule 16-15.4(2), the parties will attempt to agree to a neutral from the Attorney Settlement Officer Panel and, barring that, will resort to private mediation.

(3) Trial: The parties estimate that a trial will last 15 court days. The parties propose that the trial date be scheduled on Tuesday, October 23, 2018, and the Final Pretrial Conference be scheduled on October 2, 2018.

(4) Additional Parties: The parties do not anticipate that there will be additional parties to this litigation.

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1 (5) Jury Trial: Both plaintiffs and defendant PVA request a jury trial.

2 (6) Other Issues: The parties are not aware of other issues which would affect the status  
3 or management of the case.

4 (7) Motion To Sever/Bifurcate: The parties do not anticipate that there will be a motion  
5 to sever, bifurcate or for other ordering of proof, except possibly a bifurcated trial on  
6 the issue of the statute of limitations. This will be determined after PVA conducts  
7 discovery on those issues.

8 The Court has also ordered the parties to provide the following information with their  
9 joint scheduling conference statement:

10 (1) Jointly submitted synopsis of factual issues in the case: "Plaintiff brought a product  
11 liability case against PVA for designing and manufacturing a benchtop coating  
12 system which was used to spray toxic chemicals on circuit boards at plaintiff's job.  
13 Plaintiff alleges that the system does not have an automatic shutoff or an alarm that  
14 would make noise when a ventilation system for the toxic chemicals is not in  
15 operation. In addition, Plaintiff alleges that based on the design, Plaintiff was forced  
16 to poke his head inside the coating machine in order to check the spray. Plaintiff  
17 alleges that he did not suspect that the chemicals may have caused his injuries until  
18 March of 2015 when he received the MSDS of the chemicals. Plaintiff alleges that  
19 he used the PVA benchtop system from 2012 to 2014 and has suffered catastrophic  
20 injuries from the use and has not been able to work since 2014. His wife has a loss  
21 of consortium claim. Plaintiffs filed their lawsuit regarding these claims on  
22 February 28, 2017. PVA denies plaintiffs' allegations and contends that if plaintiff  
23 was injured he, his employer, and potentially others are responsible for his alleged  
24 injury. PVA has asserted appropriate defenses to plaintiff's allegations."

25 (2) Pleading Amendments: The parties do not anticipate that their pleadings will be  
26 amended. The parties propose that the deadline for filing motions to amend  
27 pleadings be October 11, 2017.  
28

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1 (3) Issues To Be Determined By Motions: The parties do not at this time foresee issues  
2 that may be determined by motion with the exception of a possible motion for  
3 summary judgment by PVA.

4 Dated: July 3, 2017

BECHERER KANNETT & SCHWEITZER

6 By: ~Alex Catalona~  
7 Alex P. Catalona  
8 Attorneys for Defendant  
PRECISION VALVE & AUTOMATION, INC.

10 Dated: July 3, 2017

LAW OFFICES OF TERESA LI, PC

12 By: ~Teresa Li~  
13 Teresa Li  
14 Attorneys for plaintiffs  
RUBEN JUAREZ and ISELA HERNANDEZ

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UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA

RUBEN JUAREZ an individual and ISELA	)	CASE NO. 2:17-cv-03342
HERNANDEZ, an individual,	)	
	)	[Los Angeles County Superior Court
Plaintiffs,	)	Case No. BC650229]
	)	
v.	)	<b>CERTIFICATE OF SERVICE)</b>
	)	
PRECISION VALVE & AUTOMATION,	)	
INC., a corporation and DOES 1-20,	)	
	)	
Defendants.	)	
	)	
	)	

I, Jerry M. Dumlao, declare that I am employed in the County of Alameda, State of California; I am over the age of eighteen (18) years and not a party to the within entitled action; my business address is 1255 Powell Street, Emeryville, California 94608.

On **July 3, 2017**, I caused to be served the foregoing:

**JOINT REPORT FOR JULY 10, 2017 SCHEDULING CONFERENCE**

In said action by placing a true copy thereof enclosed in a sealed envelope and served in the manner and/or manners described below to each of the parties herein and addressed as follows:

///

///

Becherer  
 Kannett &  
 Schweitzer

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 510-658-3600

1 *Attorneys for Plaintiff*

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3  
4 ☒ (By Mail) I deposited such envelope with postage thereon fully prepaid to be placed  
5 in the United States Mail at Emeryville, California. I am familiar with the mail collection  
6 practices of Becherer Kannett & Schweitzer Attorneys and pursuant to those practices the  
7 envelope would be deposited with the United States Postal Service the same day.

8 Executed on July 3, 2017.

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11 Jerry M. Dumlao  
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